

**Summary of January 25, 2001
Indiana Department of Environmental Management (IDEM) and
Clean Manufacturing and Safe Materials Institute (CMTI)
Meeting with Metal Finishers and POTWs Participating in
Metal Finishing Strategic Goals Program**

The meeting was called to order at 11:10 a.m. by facilitator Kathy Watson of IDEM. The facilitator welcomed meeting participants and summarized the main meeting agenda items. The current SGP mailing list was circulated so meeting participants could indicate their attendance and note any additions/corrections to information on the mailing list as appropriate (e.g., contact name, address, phone, fax or e-mail address.)

OPENING REMARKS FROM IDEM

- After introductions by those in attendance, IDEM Deputy Commissioner Tim Method provided brief opening remarks. Mr. Method stressed IDEM's commitment to working with metal finishers and other industrial sectors environmentally. He reported that agency representatives recently met with staff of EPA Headquarters Sustainable Industry Program regarding potential projects with the metal casting sector (i.e., foundries). Regulatory agencies and other stakeholders continue to work with industry to identify incentives for improved environmental performance.
- Noted that since the last quarterly meeting two (2) additional metal finishers and one (1) POTW/municipality have officially signed on to the SGP: Eaton Aeroquip/New Haven, Lake Erie Screw Corporation/Frankfort, and the City of Kokomo.
- Also noted that today's meeting has been approved for two wastewater continuing education credits.

NATIONAL/REGIONAL UPDATES

Matt Gluckman, Pretreatment Coordinator, EPA Region 5

Matt provided a summary of key EPA activities as follows:

Status of Proposed Metal Parts and Machinery (MP & M) Effluent Limitation Guidelines:

- Reported that the public comment period on the proposed MP & M regulation is open until May 3, 2001.
- EPA will be holding four (4) public hearings on MP & M around the country. One of those hearings will be held in Chicago on March 8 at EPA Region 5.
- Although the new administration has issued an Executive Order suspending certain rulemakings, Matt does not believe the MP & M rulemaking has been effected by this suspension.
- Proposed MP & M regulation effects eight (8) different categories; one is the metal finishing job shop category. There will not be a low-flow exception.
- A pollution prevention (P2) option is discussed in the preamble to the proposed regulation, but is not included in the rule itself. Need to hear from POTWs, companies, and states during the public comment period that this P2 alternative is something they support and would like to see in the final rule.

Status of Proposed Pretreatment Streamlining Rule:

- This proposed EPA rulemaking would provide flexibility to POTWs and industries.
- Discussed at National Pretreatment meeting in November 2000. Still several substantive issues to be worked out. Target date of June 2001 for finalizing this rule.

Other:

- Regarding status of delegation of pretreatment authority from EPA Region 5 to IDEM, Matt reported that he has talked to Bill Blue of IDEM's Office of Water Quality regarding the contents of IDEM's formal delegation request package.
- Introduced new EPA Region 5 intern who will be assisting on the SGP, Krista Durlas. Also introduced Joan Tanaka, who is assisting with the SGP, particularly on RCRA-related issues.
- EPA focusing on providing training to support the SGP. EPA Headquarters is providing contractor assistance for environmental management system training using materials developed in EPA Region 9.

- Matt indicated he is very interested in what incentives/benefits will ultimately be offered to participating metal finishers by the POTWs. He reported that although Claudio Ternieden has moved out of the Goals Program to EPA HQ's Office of Water, he had prepared a draft guide/roadmap for POTW incentives which is currently under review by EPA. Once approved, EPA Region 5 will assist in the distribution of this document to POTWs and other stakeholders.

INDIVIDUAL WORKGROUP REPORTS

RCRA Issues Workgroup

Workgroup co-lead Mark Sutton/H.H. Sumco reported that the other RCRA workgroup co-lead, Gary Romesser, is on leave from the agency and will return in mid-March. Mark distributed and presented a written update (attached) of major items under review by the RCRA Workgroup as follows:

1. Workgroup has worked with H.H. Sumco to prepare an actual solid waste variance request which other SGP companies may use as a model. Variance request was submitted to IDEM for approval in December. Sumco also submitted a variance request to the State of Illinois. IDEM's RCRA program is committed to fast-tracking variance and delisting requests submitted by SGP participants. IDEM received final authorization for delisting effective January 4, 2001.
2. Mark Stoddard and Ted Heemstra continue to develop a database of recycling facilities and recommendations for evaluating these facilities.
3. Issue of state-to-state reciprocity for solid waste variances and RCRA delistings: continues to be a frustrating issue for this workgroup and other stakeholders. Since the federal RCRA program is delegated to individual states, EPA is unable to grant national reciprocity among the states. Therefore, companies seeking variances and delistings must submit requests to each individual state in which the waste is first generated, passes through, and is ultimately transported to.
 - Although EPA Region 5 workgroup representatives have informally discussed reciprocity issues internally and with EPA Headquarters, Debbie reminded the group that Indiana's SGP Implementation Plan includes a specific task for the RCRA workgroup to prepare a white paper/issue paper framing the issue in writing for formal submission to EPA Region 5 and Headquarters.

POTW Issues Workgroup

Sue Claussen/Michigan City reported on behalf of the POTW workgroup as follows:

1. Recruitment - City of Kokomo has officially signed on.
2. A subcommittee of the IWPCA Municipal Pretreatment Committee, as well as Nancy Norton/Imagineering will be working on preparing comments regarding the proposed MP & M rule. (Several SGP POTW participants are involved in this subcommittee.) Will share their written comments with the full SGP stakeholder group. Noted that pollution prevention measures are from the point of view of the POTWs.
3. Ken Zmudzinski/South Bend POTW was unable to attend today's meeting. No report was provided by Ken on the status of a model ordinance, but they have been working on it.

Technical and Financial Assistance Workgroup

Shayla Barrett of CMTI provided the following updates:

1. Distributed two (2) handouts dealing with upcoming sessions on MP & M. The Indiana Industrial Operators' Association is hosting a workshop on February 7; and CMTI is conducting a total of seven (7) sessions around the state between February 15 and April 10, with registration required in advance by IIOA and CMTI. Noted that March 8 CMTI session may be rescheduled due to MP & M public meeting and hearing at EPA/Chicago also scheduled on that date.
2. CMTI is offering to help interested metal finishers and cities to write an environmental management system (EMS) based on a metal finisher template provided by EPA Region 9 and Tetratex and a municipal template also made available in the national SGP "toolbox." (NOTE: Refer to SGP toolbox at www.strategicgoals.org).
3. Dr. Corson reported that three (3) weeks ago CMTI was notified that the Indiana Strategic Development Fund was not going to entertain our proposal for a "manufacturing network" to apply for SDF funding as there were no dollars available for this program. However, individual metal finishers could apply for funding for employee training or training in new techniques. Additional information will be provided by CMTI in the future as received.

Emergency Preparedness Workgroup

1. Shayla reported that H.H. Sumco has stepped forward to serve as a model for developing a metal finisher emergency preparedness manual.
2. Mark Sutton noted that emergency preparedness is a supplement to an EMS and also shows continuous improvement which is an EMS requirement.
3. At the conclusion of today's full stakeholder meeting, Mark and Shayla will be setting a date for the first workgroup meeting.

Recruitment Workgroup

1. On behalf of Jerry Phillips, Shayla reported that recruitment efforts are continuing. CMTI is meeting with the City of Kokomo and their "413" electroplaters and "433" metal finishers. CMTI/other SGP participants will also meet with any other interested POTWs and their local metal finishers upon request.
2. Recruitment also continues through CMTI's periodic SGP newsletter sent to all 413 and 433s in the state.
3. Jerry Phillips will represent Mark Sutton at the January 28 SGP Industry Board of Directors meeting to be held in Orlando.
4. Mark Sutton also reported that Metal Plate Polishing/Ft. Wayne and references to the SGP were featured in the Winter 2000 edition of Automotive Finishing. Mark requested that Debbie distribute copies of the article to the SGP mailing list.

NOTE: you can access the article electronically at www.afonline.com.

Performance Ladder/5-Star Workgroup

Cheri Storms of IDEM/OPPTA reported that the 5-Star Workgroup met this morning at OPPTA's office. Highlights of the meeting include:

- IDEM's draft Metal Finisher 5-Star Environmental Recognition Program application/eligibility criteria integrates with the national SGP "bronze, silver and gold" recognition levels. Two (2) Stars are equivalent to SGP bronze; Three (3) Stars to SGP silver; and Four (4) Stars equivalent to SGP gold. The 5th Star requires an environmental management system, as does EPA's National Performance Track Program.
- Several minor revisions and additional information were suggested to be made to the working draft at this morning's workgroup meeting. Cheri will be making these changes to the working draft and will disseminate the draft with an inserted listing of proposed incentives to the full stakeholder group for comments in the near future.
- Incentives list will continually be updated as new benefits at the state and local (POTW) levels are identified in the future.
- Next meeting of workgroup tentatively scheduled for March 28 at Purdue at 1:00 p.m., subject to room availability.
- 5-Star Program on track for kick-off in early summer 2001.

DRAGOUT PRESENTATION BY CMTI AND DISCUSSION

Shayla Barrett/CMTI made the following presentation:

1. First went through the seven (7) facility-based SGP performance goals and how reducing dragout from the process bath to the rinse tank could contribute to progress in achieving the SGP goals.
2. Showed EPA's Merit Partnership P2 Project videotape regarding Dragout Reduction. Video emphasized the following key points:
 - Proper parts racking,
 - Process bath control,
 - Part removal – importance of controlling the withdrawal rates from the tank and decreasing the removal time,
 - Emphasis on using equipment properly (e.g., hang bars, drain boards, rinse guards, rinse tanks adjacent to process baths, etc).
3. Explained that upon request, CMTI will visit individual metal finishing facilities to make a dragout presentation which includes showing the videotape to company employees. Then a conductivity meter is utilized to illustrate the reduction in metals drug out of the process bath from modifying worker or mechanical techniques during the plating process. Shayla noted there is no charge for this service to SGP participants; and a nominal fee to non-SGP metal finishers.

4. CMTI will investigate with EPA Region 5 the possibility of acquiring additional copies of the dragout video from EPA for distribution to SGP metal finishers free of charge.

OTHER ISSUES/ANNOUNCEMENTS/FUTURE AGENDA TOPICS

Possible future agenda topics were offered and feedback provided as follows:

1. Progress/attaining specific SGP goals (e.g., 25% reduction in energy use).
2. Specific pollution prevention issues and technology options.
3. Overview of environmental management systems, including a presentation/assistance by those currently ISO 14001 certified or implementing a similar EMS.
4. Compliance issues/specific questions.
 - Noted that group would be interested in information regarding RCRA satellite accumulation and universal waste requirements.

NOTE: IDEM guidance documents concerning these topics may be found at:

http://www.state.in.us/idem/olq/publications/guidance/Satellite_Accum_HazWaste_Gener.pdf and

http://www.state.in.us/idem/olq/publications/guidance/Universal_Waste_Rule_Info.pdf.

5. Pretreatment videos – noted there are four of them. Contact is Sue Claussen.
6. Development of Indiana SGP Implementation Plan for 2001-2002.

Shayla announced he will be preparing a paper and making a presentation at the annual SURFIN conference in June 2001. He would like to make a presentation on SGP success stories and needs metal finisher case studies. Companies interested in being a case study are urged to contact Shayla, otherwise he will pursue an overall compendium.

NEXT STEPS

1. IDEM to prepare meeting summary, update the Indiana SGP implementation plan, and distribute these documents. **A copy of the updated implementation draft for 2000-2001 is attached.**
2. Workgroups should continue to meet over the coming weeks.

DATE/LOCATION OF NEXT MEETING

Tentatively scheduled for Thursday, May 3 from 11:00 a.m. – 1:00 p.m. at IDEM, Indiana Government Center North, in Indianapolis. Confirmation and meeting notice will be sent later.

ADJOURNMENT

The facilitator adjourned the meeting at 1:00 p.m.

Attachments: RCRA Workgroup Report 1/25/01

Indiana SGP Implementation Plan for 2000-2001 – Updated 2/20/01

Article from Winter 2000 issue of Automotive Finishing entitled “Plating Plant for Semitrailer Parts Sprouts Up in a ... Brownfield.”

NOTE: Have added paper copy of article from the Merit Partnership Pollution Prevention Project for Metal Finishers – “Reducing Dragout with Spray Rinses.”

Paper may also be found on the web at http://www.epa.gov/region09/cross_pr/merit/spray.pdf